

USDC SDNY  
DOCUMENT  
ELECTRONICALLY  
DOC #:  
DATE FILED: 10/6/2020 - 1



**DEREK SMITH**  
LAW GROUP, PLLC  
Employment Lawyers Representing Employees Exclusively

Monday, October 5, 2020

VIA ECF

Honorable Alvin K. Hellerstein, U.S. District Court Judge  
United States District Court, Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

*So reviewed  
10-6-20  
[Signature]*

RE: Michael Dimas v. Francios Payard, LLC, et al.  
Civ. No. 18-cv-07873

Dear Judge Hellerstein:

We represent Plaintiff, Michael Dimas, in the above-referenced action. I write to Your Honor to request an extension of the date to submit the documentation necessary to substantiate Plaintiff's claimed damages per Your Honor's order in ECF Docket entry #67 of this matter. Plaintiff requests an extension of fourteen (14) days from the current date of 10/5/2020 to 10/19/2020.

This is the fourth request for an extension since March 2020 due to the Coronavirus State of Emergency. The on-going operational disruption caused by the COVID-19 outbreak has prevented Plaintiff's counsel from being able to compile all of verified documents necessary to comply with Your Honor's order. Our firm's office, where Plaintiff's hard file is located containing copies of the documents and notes necessary to fully comply with Your Honor's order, only recently partially reopened. However, during the first week of reopening, three weeks ago, I suffered a foot injury that severely limits my mobility and has prevented me from being able to travel to our office. We are making arrangements to have the entire hard file in our office either scanned and/or delivered to me so that I may file the appropriate documents in accordance with Your Honor's order. Accordingly we ask for an additional extension of the aforementioned deadline.

Thank you for your consideration in this matter.

Respectfully submitted,

Seamus P. Barrett, Esq.